UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

No: 5:13-CR-174-1BO

UNITED STATES OF AMERICA)	
)	
)	
V.)	MOTION TO WITHDRAW
)	AS COUNSEL OF RECORD
)	
JONQUILL MCKINLEY)	
)	

NOW COMES the undersigned counsel, Nardine Mary Guirguis, and moves this Honorable Court for an order allowing her to withdraw as counsel of record in the above referenced case. The undersigned counsel respectfully shows unto the Court the following in support of this motion:

- 1. The defendant was indicted on June 18, 2013 and charged with possession with intent to distribute a quantity of heroin in violation of 21 U.S.C. § 841(a)(1), being a felon in possession of a firearm and ammunition in violation of 18 U.S.C. §§ 922(g)(1) and 924, and three counts of distributing a quantity of heroin in violation of 21 U.S.C. § 841(a)(1).
- 2. The undersigned counsel entered her notice of appearance on August 6, 2013.
- 3. Pursuant to North Carolina Rules of Professional Conduct 1.16, undersigned counsel has determined the necessity to respectfully request to withdraw from the aforementioned case as counsel is in receipt of Defendant's request for her withdrawal.

WHEREFORE, the undersigned counsel respectfully moves this Honorable Court for an order allowing her to withdraw as counsel for Jonquill McKinley.

Respectfully submitted this 25th day of November, 2013.

GUIRGUIS LAW, PA

/s/ Nardine Mary Guirguis
Nardine Mary Guirguis
Attorney for the Defendant
434 Fayetteville Street, Suite 2350
Raleigh, North Carolina 27601
Telephone: (919) 832-0500
nardine@guirguislaw.com
CJA Appointed Counsel

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon the Assistant Attorney for the United States by electronic transmission as indicated below:

> Toby Lathan Assistant United States Attorney 310 New Bern Avenue, Suite 800 Raleigh, North Carolina 27601-1461 toby.lathan@usdoj.gov

This 25th day of November, 2013.

GUIRGUIS LAW, PA

/s/ Nardine Mary Guirguis
Nardine Mary Guirguis
Attorney for the Defendant
434 Fayetteville Street, Suite 2350
Raleigh, North Carolina 27601
Telephone: (919) 832-0500